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10 Attorney for Defendant
11 DARRELL DANIEL

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE EASTERN DISTRICT OF CALIFORNIA

14
15 UNITED STATES OF AMERICA,) Case No. 2:24-cr-00261-JAM
16 Plaintiff,)
17 vs.) **FOURTH STIPULATION AND ORDER TO**
18) **CONTINUE STATUS CONFERENCE AND**
19) **EXCLUDE TIME**
20) Date: July 15, 2025
21) Time: 9:00 a.m.
22) Judge: Hon. John A. Mendez
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16 IT IS HEREBY STIPULATED by and between Michele Beckwith, Acting United States
17 Attorney, through Assistant United States Attorney Justin Lee, attorney for Plaintiff and Federal
18 Defender Heather E. Williams through Assistant Federal Defender Mia Crager, attorney for
19 Darrell Daniel, that the status conference, currently scheduled for July 15, 2025, be continued to
20 August 19, 2025 at 9:00 a.m.

21 The parties are engaged in plea negotiations and defense counsel needs time to discuss
22 possible resolutions with her client. The parties anticipate a possible change of plea on August
23 19, 2025. Counsel for defendant believes that failure to grant the above-requested continuance
24 would deny counsel the reasonable time necessary for effective preparation, taking into account
25 the exercise of due diligence.

26 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
27 excluded of this order's date through and including August 19, 2025; pursuant to 18 U.S.C.
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§3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order 479, Local Code A and T4 based upon time to complete an examination and defense preparation.

Counsel and the defendant also agree that the ends of justice served by the Court granting this continuance outweigh the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

Dated: July 8, 2025

HEATHER E. WILLIAMS
Federal Defender

/s/ *Mia Crager*
MIA CRAGER
Assistant Federal Defender
Attorney for Defendant
DARRELL DANIEL

Dated: July 8, 2025

**MICHELE BECKWITH
Acting United States Attorney**

/s/ Justin Lee
JUSTIN LEE
Assistant U.S. Attorney
Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including August 19, 2025, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code A and T4). It is further ordered the July 15, 2025 **status conference** shall be **CONTINUED** until **August 19, 2025, at 9:00 a.m.**

Dated: July 08, 2025

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE